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March 24, 2006

**BY E-FILE**

The Honorable Kent A. Jordan  
United States District Court  
for the District of Delaware  
U.S. Courthouse  
844 King Street  
Wilmington, Delaware 19801

Re: Honeywell International, Inc., *et al.*, v. Apple Computer, Inc., *et al.*,  
D. Del., C.A. No. 04-1338-KAJ  
Honeywell International Inc., *et al.* v. Audiovox Communications Corp., *et al.*,  
D. Del., C.A. No. 04-1337-KAJ  
Optrex America, Inc. v. Honeywell International Inc., *et al.*,  
D. Del., C.A. No. 04-1536-KAJ

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Dear Judge Jordan:

I write on behalf of the Manufacturer Defendants in response to Mr. Grimm's letter of earlier today enclosing Honeywell's proposed Scheduling Order.

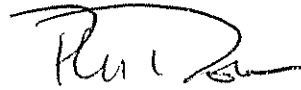
Honeywell's unilateral submission of its proposal is unfortunate. Counsel for Honeywell circulated its proposal to the Manufacturer Defendants following the March 13 teleconference with the court; however, at no time did Honeywell's counsel propose a date by which it intended to submit its proposed order, much less suggest a date by which it wished to receive comments from defendants.

Notwithstanding Honeywell's continued refusal to appreciate the difficulties associated with attempting to coordinate a single response from such a large group of defendants, I am pleased to report that there are very few differences between the Manufacturer Defendants' proposed Scheduling Order and the one submitted by Honeywell earlier today. Had Honeywell had the courtesy to communicate with Defendants prior to submitting its proposed order, perhaps even those few differences could have been resolved.

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Regardless, on behalf of the Manufacturer Defendants, we enclose for Your Honor's review and approval the Manufacturer Defendants' Scheduling Order proposal and a marked version showing the differences between the parties' competing proposals. As the Court will note, the only differences between the Manufacturer Defendants' proposed Order and plaintiffs' proposal can be found in paragraphs 9, 16 and 18. We believe that the Manufacturer Defendants' proposals for those paragraphs more closely reflect the guidance Your Honor provided during the March 13 teleconference. Most significantly, we believe that, with respect to the Trial (§ 18), the Court specifically limited the trial to issues of validity and enforceability. The Manufacturer Defendants' proposal, which states just that, best reflects Your Honor's directive.

Respectfully,

A handwritten signature in black ink, appearing to read "Philip A. Rovner", with a stylized flourish at the end.

Philip A. Rovner  
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PAR/mes/725124

Enc.

cc: All Local Counsel of Record – By ECF